

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
FREE SPEECH SYSTEMS LLC,	§	Chapter 11 (Subchapter V)
.	§	
	§	Case No. 22-60043 (CML)
	§	
Debtor.	§	Jointly Administered

NOTICE OF RULE 2004 SUBPOENA DUCES TECUM

TO: Auriam Services LLC, 206 E 9th Street, Suite 1300, Austin, Texas 78701.

Pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure and Rule 2004-1 of the Bankruptcy Local Rules of the Southern District of Texas, Melissa Haselden (“Subchapter V Trustee”) hereby serves the attached Rule 2004 Request upon Auriam Services LLC (“Auriam”) and requests production of the documents listed in **Exhibit A** attached hereto.

The Debtors must produce the requested documents listed on the Subpoena Duces Tecum attached hereto as **Exhibit A** to the undersigned counsel at the offices of Jackson Walker LLP, 100 Congress Ave. Suite 1100, Austin, Texas 78701 within fourteen (14) days of service of this Notice. Alternatively to physical production, Auriam may produce the requested documents electronically via sharefile to liz@lizfreemanlaw.com or sgallagher@jw.com.

Houston, TX

Dated: March 16, 2023

/s/ Elizabeth Freeman

LAW OFFICE OF LIZ FREEMAN

Liz Freeman (TX Bar No. 2400922)

PO Box 61209

Houston, TX 77208-1209

Telephone: (832) 779-3580

Email: liz@lizfreemanlaw.com

JACKSON WALKER LLP

Sean Gallagher (TX Bar No. 24101781)

100 Congress Ave., Suite 1100

Austin, TX 78701

Telephone: (512) 236-2014

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Counsel for Melissa Haselden, Subchapter V Trustee

CERTIFICATE OF SERVICE

I certify that on March 16, 2023 a true and correct copy of the above and foregoing was served via CM/ECF to all parties registered to receive electronic notice.

/s/ Elizabeth Freeman

Elizabeth Freeman

DEFINITIONS

All definitions apply throughout without regard to capitalization. Terms are defined as follows:

1. The terms “and” and “or” are to be read and applied inclusively to have the broadest reasonable meaning.
2. The terms “any” or “all” are synonymous and are to be read and applied inclusively to have the broadest reasonable meaning.
3. “Agreement” means a contract, arrangement, or understanding, formal or informal, oral or written.
4. “Auriam” refers to Auriam Services LLC and its agents, attorneys, assigns, representatives, affiliates, businesses, entities, any individuals or entities acting in concert with it, and any of its “insiders” as that term is defined in 11 U.S.C. § 101(31).
5. “Blue Ascension” refers to Blue Ascension Logistics, LLC, the warehouse logistics company currently employed by or on behalf of PQPR.
6. “Communication” shall mean and include, without limitation, any documents, telephone conversations, discussions, facsimiles, e-mails, meetings, memorandum and any other medium through which any information is conveyed.
7. The terms “concerning,” “regarding,” “relating to,” “referring to,” and “arising out of” are to be understood in their broadest sense and each means concerning, constituting, identifying, evidencing, summarizing, commenting upon, referring to, relating to, arising out of, describing, digesting, reporting, listing, analyzing, studying, discussing, stating, setting forth, reflecting, interpreting, concerning, recording, including, negating, manifesting, containing, consisting of, dealing with, comprising, or in any way pertaining to the subject matter identified, in whole or in part.
8. The terms “document” or “documents” have the broadest meaning that can be ascribed to them, including, without limitation, all final forms and all drafts and revisions of any type of written or graphic matter, original or reproduced, and all copies thereof which are different in any way from the original, regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the foregoing, the term “document” includes video tapes, films, audio tapes, electronic mail, computer disks, compact disks, books, papers, letters, telegrams, memoranda, communications, minutes, notes, schedules, tabulations, vouchers, accounts, statements, affidavits, reports, abstracts, agreements, contracts, diaries, calendars, plans, specifications, drawings, sketches, photographs, charts, graphs and other similar objects, summaries or records of telephone conversations, and any kind of transcript, transcription or recording of any conversation, discussion or oral presentation of any kind, and any information stored on and reproducible in documentary form from a computer or other electronic information storage device.

9. “FSS” refers to Free Speech Systems, LLC and each of its current or former subsidiaries, affiliates, parents, predecessors and successors, legacies, divisions, departments and operating units, funds, any Persons acting on its behalf or under its control, and its respective advisors, attorneys, agents, directors, employees, members, partners, representatives, and staff as well as any “insider” of FSS as that term is defined in 11 U.S.C. § 101(31).

10. The terms “Person” and “Persons” mean any and all natural persons, male or female, and all types and kinds of businesses or other entities, including, but not limited to, corporations, partnerships, joint ventures, sole proprietorships, and governmental agencies (state or federal) or their employees.

11. “PQPR” refers to PQPR Holdings Limited, LLC.

12. The terms “you” and “your” shall mean Auriam as defined above.

13. The use of the singular form of any word includes the plural and vice versa.

14. The past tense shall include the present tense and vice versa.

INSTRUCTIONS

1. In responding to these requests, furnish all information that is available to Auriam regardless of whether the records are possessed directly by the company or Auriam's owners, members, agents, attorneys, employees, representatives, superiors, or investigators.
2. If any records cannot be produced in full, Auriam should produce to the extent possible, specifying the Auriam's reason(s) for its inability to produce the records in full and stating whatever information, knowledge, or beliefs the Auriam has concerning the unproduced portion.
3. To the extent that Auriam has previously produced in this case a record responsive to the requests contained herein, it need not produce such record again in connection with these requests.
4. To the extent that any of the following requests for production may call for what Auriam believes to be information subject to a claim of privilege, answer so much of each Request for Production and each part thereof as does not request, in Auriam's view, privileged information and set forth, in writing in a privilege log, with particularity, the basis for Auriam's claim of privilege with respect to the information it withholds, including the sender and recipient of the information and the date the information was created ("Privilege Log"), and provide a copy of the Privilege Log contemporaneously with Auriam's production of the records requested in the Requests for Production.
5. The scope, definitions, and instructions applicable to these discovery requests are coextensive with the applicable sections of the Federal Rules of Civil Procedure, and each discovery request requires the production of documents and information to the fullest extent permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.
6. You are requested to serve copies of all responsive documents with your response pursuant to Federal Rule of Civil Procedure 34. However, if responsive documents are voluminous, produce the responsive documents for inspection at the office of Jackson Walker LLP, 100 Congress Ave., Suite 1100, Austin, Texas 78701. You may also produce documents electronically to proposed counsel to the Subchapter V Trustee via email to **liz@lizfreemanlaw.com** and **sgallagher@jw.com**.
7. In producing documents, please produce them in their original form. Documents shall be produced in the same sequence as they are contained or found in their original file folder.

EXHIBIT A

DOCUMENTS REQUESTED

REQUEST FOR PRODUCTION NO. 1: All agreements between Auriam, on the one hand, and any individual or entity associated with or doing business with Alex Jones or FSS, on the other.

REQUEST FOR PRODUCTION NO. 2: Any written agreements between Auriam and FSS.

REQUEST FOR PRODUCTION NO. 3: Any written agreements between Auriam and PQPR.

REQUEST FOR PRODUCTION NO. 4: Any written agreements between FSS and Anthony Gucciardi.

REQUEST FOR PRODUCTION NO. 5: Any written agreements between PQPR and Anthony Gucciardi.

REQUEST FOR PRODUCTION NO. 6: All internal communications or meeting minutes of Auriam regarding FSS.

REQUEST FOR PRODUCTION NO. 7: All internal communications or meeting minutes of Auriam regarding PQPR.

REQUEST FOR PRODUCTION NO. 8: Copies of all invoices sent by Auriam to FSS from 2016 to the present.

REQUEST FOR PRODUCTION NO. 9: Copies of all invoices sent by Auriam to PQPR from 2016 to the present.

REQUEST FOR PRODUCTION NO. 10: All communications between Auriam and FSS from 2016 to the present.

REQUEST FOR PRODUCTION NO. 11: All communications between Auriam and PQPR from 2016 to the present.

REQUEST FOR PRODUCTION NO. 12: All communications between Auriam and Alex Jones from 2016 to the present.

REQUEST FOR PRODUCTION NO. 13: All documents related to any written agreements or understandings between FSS and Auriam from 2016 through the present.

REQUEST FOR PRODUCTION NO. 14: All documents related to any written agreements or understandings between PQPR and Auriam from 2016 through the present.

REQUEST FOR PRODUCTION NO. 15: All corporate governance documents or operating agreements for Auriam from 2016 to the present.

REQUEST FOR PRODUCTION NO. 16: Copies of Auriam books and records from 2016 to the present.

REQUEST FOR PRODUCTION NO. 17: Copies of Auriam tax returns from 2016 to the present.

REQUEST FOR PRODUCTION NO. 18: Documents sufficient to show any and all distributions, draws or payments of any kind or character from January 1, 2021 through the present from or to the following individuals and companies:

- FSS;
- PQPR;
- Anthony Gucciardi;
- [REDACTED]
- [REDACTED]
- Blue Ascension;
- Patrick Riley;
- Elevated Solutions 512 Group Holdings, LLC;

- Patriot Collectibles;
- Joe Dalessio;
- MRJR;
- Acuity CxO;
- Robert Roe;
- AEJ Holdings, Inc.;
- AEJ Austin Holdings Logistics, LLC;
- Alex Jones;
- Dr. David Jones;
- Dr. J's Naturals; and
- Healthy Happy Body

REQUEST FOR PRODUCTION NO. 19: Copies of any and all advances made or received to or from any other entity or individual for the last three years.

REQUEST FOR PRODUCTION NO. 20: Documents sufficient to show the source(s) and amounts of Auriam's initial capital contributions.